

1 J. Andrew Coombs (SBN 123881)
andy@coombspc.com
2 Annie S. Wang (SBN 243027)
annie@coombspc.com
3 J. Andrew Coombs, A Prof. Corp.
517 East Wilson Avenue, Suite 202
4 Glendale, California 91206
Telephone: (818) 500-3200
5 Facsimile: (818) 500-3201

6 Attorneys for Plaintiff Adobe
Systems Incorporated
7

8 UNITED STATES DISTRICT COURT
9

10 NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO DIVISION)

11 Adobe Systems Incorporated,)	Case No. C08-0933 MMC
)	
12 Plaintiff,)	REQUEST TO CONTINUE CASE
13 v.)	MANAGEMENT CONFERENCE
)	
14 Beverly Johnson and Does 1 through 10,)	
inclusive,)	
)	
15 Defendants.)	

16 PLAINTIFF Adobe Systems Incorporated ("Adobe" or "Plaintiff") by and through its
17 counsel of record, J. Andrew Coombs, of J. Andrew Coombs, A P.C., hereby requests as follows:

18 WHEREAS the Court set the Scheduling Conference in the above-captioned matter on May
19 23, 2008, at 10:30 a.m.;

20 WHEREAS Defendant was served on or about February 24, 2008;

21 WHEREAS Plaintiff filed the Proof of Service on or about March 11, 2008;

22 WHEREAS Defendant's answer was due on or about March 15, 2008;

23 WHEREAS Plaintiff filed its Request for Entry of Default on or about April 11, 2008;

24 WHEREAS the Clerk entered default against Defendant on or about April 15, 2008;

25 WHEREAS Defendant has not filed an answer or otherwise responded to the Complaint;

26 WHEREAS Defendant's representative contacted Plaintiff's counsel on or about May 8,
27 2008, seeking to resolve this matter;
28

1 WHEREAS Plaintiff is currently preparing its Motion for Default Judgment while awaiting
2 certain disclosures from Defendant in order to alternatively pursue settlement;

3 WHEREAS there have been no prior continuances requested by the Parties; and

4 NOW, THEREFORE, Plaintiff requests that the Case Management Conference in the above
5 captioned matter be continued until July 18, 2008, or a date thereafter acceptable to the Court.
6

7 Dated: May 13, 2008

J. Andrew Coombs, A Professional Corp.

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9 By: /s/ J. Andrew Coombs
10 J. Andrew Coombs
11 Annie S. Wang
12 Attorneys for Plaintiff Adobe Systems Incorporated
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PROOF OF SERVICE

I, the undersigned, certify and declare that I am over the age of 18 years, employed in the County of Los Angeles, and not a party to the above-entitled cause. I am employed by a member of the Bar of the United States District Court of California. My business address is 517 E. Wilson Ave., Suite 202, Glendale, California 91206.

On May 13, 2008, I served on the interested parties in this action with the following:

REQUEST TO CONTINUE CASE MANAGEMENT CONFERENCE
[PROPOSED] ORDER GRANTING CONTINUANCE OF CASE
MANAGEMENT CONFERENCE

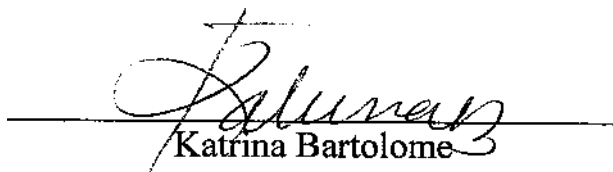
for the following civil action:

Adobe Systems Incorporated v. Beverly Johnson, et al.

by placing a true copy thereof in an envelope to be immediately sealed thereafter. I am readily familiar with the office's practice of collecting and processing correspondence for mailing. Under that practice it would be deposited with the United States Postal Service on the same day with postage thereon fully prepaid at Glendale, California in the ordinary course of business. I am aware that on motion of the party served, service presumed invalid if postal cancellation date or postage meter is more than one day after date of deposit for mailing in affidavit.

Beverly Johnson 7147 S. Woodlawn, Apt. 1-N Chicago, IL 60619	<i>Courtesy Copy to:</i> David Bloom Evans Loewenstein Shimanovsky Moscardini 130 S. Jefferson, Ste. 500 Chicago, IL 60661
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Place of Mailing: Glendale, California
Executed on May 13, 2008, at Glendale, California


Katrina Bartolome

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6 Attorneys for Plaintiff Adobe
7 Systems Incorporated

8
9 UNITED STATES DISTRICT COURT

10 NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO DIVISION)

11 Adobe Systems Incorporated,) Case No. C08-0933 MMC
12)
Plaintiff,) [PROPOSED] ORDER GRANTING
13 v.) CONTINUANCE OF CASE
Beverly Johnson and Does 1 through 10,) MANAGEMENT CONFERENCE
14 inclusive,)
15 Defendants.)
16 _____)

17 On or about February 29, 2008, the Court set a Case Management Conference on May 23,
18 2008 at 10:30 a.m.

19 Plaintiff thereafter filed its request to continue the Case Management Conference to allow
20 sufficient time to engage in settlement negotiations and/or file a motion for default judgment.

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22 ///

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1 In light of the request, the Case Management Conference currently on calendar for May 23,
2 2008 at 10:30 a.m., is continued until _____, at _____.

3
4 IT IS SO ORDERED:

5
6 Dated:

7 Hon. Maxine M. Chesney
United States District Judge, Northern District of
8 California

9 PRESENTED BY:

10 J. Andrew Coombs, A Professional Corp.

11 By: /s/ J. Andrew Coombs
12 J. Andrew Coombs
13 Annie S. Wang
Attorneys for Plaintiff Adobe Systems Incorporated

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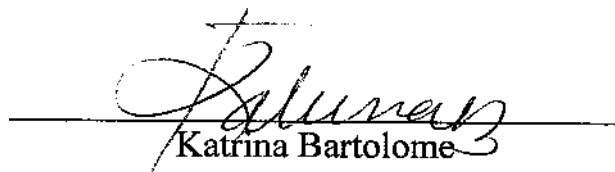
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